**Goals for The Estate of Simone Langston vs. Dr. Lefu Harrison**

**I. Plaintiff's Opening:**

1. Establish that Dr. Lefu Harrison violated the hospital code when he tried to get Simone Langston's permission to do a biopsy when he knew she had signed a Denial of Treatment Form and he knew of her religious beliefs in the Temple Bono Veletudo
2. Establish that Gopi conspired with Dr. Lefu Harrison to get Simone Langston to sign the contract giving all right to her cells to Dr. Harrison.
3. Establish that Dr. Quincy Ebardiar aided Dr. Harrison and Gopi when he administered a competency test on Simone when he knew she could not understand the contract she was being asked to sign and allowing herself to be given a biopsy when he knew it was against of her religious beliefs.

**II. Defendant's Opening:**

1. Establish that Dr. Lefu Harrison was an admired and accomplished Pathologist, who discovered in Simone Langston's cancerous colon cells the potential for fighting and perhaps winning the battle against the number 13 killer of people around the world (cancer).
2. Establish that Dr. Lefu Harrison told Simone Langston about his discovery and the possibilities that her cells might cure cancer and he wanted her to reconsider her decision in signing the Denial of Treatment Form and in doing so further the benefits to mankind (Gerimondlan).
3. With the assistance of Gopi, Simone's primary nurse, Dr. Lefu Harrison received Simone's signature on the contract for the cells and he had her tested for her competency before she executed the contract. He also received her permission to perform a biopsy of her cells.

**III. Plaintiff's call**

* **Avery Langston:**

1. Establish that Avery is an only child who has lost her mother, her home her husband and now she is homeless because of Dr. Lefu Harrisons  taking advantage of her ailing and dying mother.
2. Establish that Avery told Dr. Lefu Harrison that her mother's religion prevented her from giving him any cells, regardless of the reasons and that she would prefer that he not stalk her mother because it was causing her health to deteriorate
3. Establish that Avery never signed any note and deliver it to Dr. Lefu Harrison offering a deal at $200,000.

* **Dr. Tabor Caget:**

1. Establish that Dr. Caget is Simone's primary treating physician and he specializes in cancer treatment and research.  He was her only treating physician during her stay at United General Hospital.
2. Establish that Dr. Caget got permission from Simone Langston to treat her with chemotherapy for both her colon and lung cancer.  That he also had a competency exam performed on Simone before he had her sign the Consent Form
3. Establish that Dr. Caget thought that Dr. Lefu Harrison was wrong in approaching Simone after she had signed a Denial of Treatment Form and that Caget thought that Dr. Lefu Harrison took advantage of Simone in having her sign a contract on April 11th when he knew, or should have known that she was clearly not competent and almost in a zombie state of mind.

* **Dr. Farly Davis:**

1. Establish that Dr. Farly Davis was an expert psychiatrist who had been head of the hospital's psychiatry division at United General Hospital and was now a consultant to the hospital and was called in on the Simone Langston case to perform a competency examination.
2. Establish that Dr. Farly Davis performed the Mini-Mental State Examination, or MMSE on Simone on February 22nd and again on April 8th and the first time she scored a 24 and the second time she scored a 12.
3. Establish that Dr. Farly Davis believes that Simone Langston was not competent on April 11 and therefore could not have executed a valid contract and that Dr. Lefu, Gopi and Dr. Quincy Ebardiar had all conspired to take advantage of Simone Langston.

**IV. Defense calls,**

* **Gopi Anandganda:**

1. Establish that Gopi was Simone's primary nurse and spent more time with Simone than anyone including her daughter near the end of Simone's life and that Gopi and Simone shared the same religion, the Temple of Bono Veletudo.
2. Establish that Gopi believed that Dr. Lefu Harrison was a good man and that his discovery of the beneficial properties in Simone's cancer was incredibly important for mankind and that she should help Dr. Lefu Harrison and talk with Simone about giving her consent for the sake of mankind (gerimondlan).
3. Establish that Gopi witnessed Simone signing the contract for the cells over to Dr. Lefu Harrison and she witness the competency test being administered and she saw the results in the behavior of Simone after she administered the Naloxone to Simone

* **Dr. Lefu Harrison:**

1. Establish that Dr. Lefu Harrison was a driven man once he discovered that special properties in Simone Langston's cancer cells and wanted her to be a part of history along with himself.
2. Establish that Dr. Lefu Harrison felt that Simone would give her consent once she understood the significance of his findings and he received assistance in getting his message across to Simone through nurse Gopi
3. Establish that Dr. Lefu Harrison had Simone pass a competency test and thereafter had her sign a contract for exclusive rights to the cells to his company and had her agree to undergo a biopsy to obtain more cells.

* **Dr. Quincy Ebardiar:**

1. Establish that Dr. Quincy Ebardiar was a psychiatrist who knew Dr. Lefu Harrison and was call to administer a competency test on Simone Langston on April 11th at United General Hospital.  It was a Saturday and because of short notice Dr. Quincy Ebardiar charged a higher rate for his services.
2. Establish that Dr. Quincy Ebardiar worked at one time for United General Hospital and he and Dr. Farly Davis do not agree on which test to administer for competency.  Dr. Quincy Ebardiar uses a more modern test called the Montreal Cognitive Assessment (MoCA) and not the MMSE test which Dr. Farly Davis administered on Simone.
3. Establish that Dr. Quincy Ebardair administered the MoCA test on Simone Langston on April 11th and she passe and in capacity as an expert he determined that Simone was fully competent to understand the situation and the request being made of her.

**V. Defendant's Closing Argument:**

1. Dr. Lefu Harrison used every legitimate tactic available to him to get Simone Langston to understand the importance of his discovery and the significance of her contribution if she would agree to his offer.
2. Dr. Lefu Harrison was assisted by Gopi in obtaining Simone's permission to sign over the rights to her cells and Dr. Quincy Ebardiar merely helped by administering the competency test so that there could be no question that Simone knowingly gave her consent.
3. Dr. Lefu Harrison put up all his life savings to pay for the rights to Simone's  cells and he was driven by the desire to cure cancer and not by greed to make money off Simone.

**VI. Plaintiff's Closing Argument:**

1. Avery lost it all and she and her mother were taken advantage of by Dr. Lefu  Harrison, Gopi and Dr. Quincy Ebardiar, all of whom conspired to get her mother consent when she was less than 24 hours from death.
2. Avery told Dr. Lefu Harrison not to insist on getting her mother to sign over the rights to the cells, regardless of who might be helped by his discovery given her mother's strict religious beliefs.
3. Avery did not sign any note asking for any amount of money for her consent.